

EXHIBIT “3”

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1 of Ms. McCollum?

2 A. I'm unaware. I don't know.

3 Q. During the time that Ms. McCollum was

4 employed by you, were there any reports to

5 you from Wilson, Price that her performance

6 was less than adequate?

7 A. I don't think so. I don't think so.

8 Q. Okay. When you hired Bobby Lake, were you

9 aware that your contract forbade the hiring

10 of any person from Wilson, Price who was

11 involved in implementing that contract for

12 a period of 180 days?

13 MR. TRAWICK: Object to the form.

14 Are you stating that's what

15 the contract states?

16 MR. JACOBS: Yes.

17 Q. I'm asking you if you were aware there was

18 a restriction in your contract with Wilson,

19 Price that you could not hire any of their

20 employees who were involved in that

21 contract for a time period after completion

22 of the contract.

23 A. Of how many days?

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1 Q. I believe it was -- I believe it was 180

2 days.

3 Eighteen months. I'm sorry.

4 A. Those items were discussed with Wilson,

5 Price when Bobby's employment was sought.

6 So we were aware, yes, but the items were

7 discussed with Wilson, Price.

8 Q. Whom did you discuss it with at Wilson,

9 Price?

10 A. I basically -- I personally don't think I

11 discussed with anybody anything. I think

12 Mr. Lake -- it was his responsibility to

13 review that.

14 Q. Okay. But Amtren was a signatory to the

15 contract?

16 A. I'll have to see the contract that you're

17 talking about. You're talking about for

18 that -- the Wilson, Price contract?

19 Q. Yes.

20 A. How can I answer that without seeing it? I

21 mean, I would say we entered into an

22 agreement, yes, to purchase MAS90. I do

23 not recall the details of the contract, to

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1 that nature.

2 Q. Okay.

3 A. Does that -- that's the best I can answer.

4 Q. Okay. I'm going to ask you about some

5 individuals now. Jerry Weisenfeld is the

6 first one. What was Jerry Weisenfeld's

7 title?

8 A. His title, I believe, was business manager

9 or business management. It was more of a

10 business expansion role.

11 Q. Okay. Was his job different from the

12 person who now has the title of business

13 manager?

14 A. Oh, yes, completely.

15 Q. Okay.

16 A. Yes. His role -- to clarify,

17 Mr. Weisenfeld's role was sales and

18 vendor -- large account relations. We have

19 a lot of large accounts. His role on the

20 business side was really not the inner

21 workings, but more about sales, to assist

22 in sales, development of strategic

23 relationships with some of our larger

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1 accounts.

2 Q. Did he have any responsibility for the

3 MAS90 system?

4 A. No, he did not have any responsibility.

5 Q. Did he have any responsibilities for

6 banking?

7 A. No, no direct responsibilities for banking.

8 Q. Did he have an indirect responsibility?

9 A. No, I don't think so.

10 Q. Okay.

11 A. You know, his role did overlap in certain

12 areas, but he didn't have any direct

13 responsibility for banking.

14 Q. And was it Mike Bishop you told me was the

15 logistics person?

16 A. No, David Fields.

17 Q. David Fields. Okay.

18 Did David Fields ever make any large

19 mistakes in inventory?

20 A. Pertaining to what period? The period --

21 Q. During the time he was employed by Amtren.

22 A. In a previous position. It wasn't his

23 mistake as an individual, but we did have